

EXHIBIT E



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March 29, 2019

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BY E-MAIL

Special Master David Cohen
Carl B. Stokes U.S. Courthouse
801 West Superior Avenue
Cleveland, OH 44113-1837
david@specialmaster.law

Re: *In Re National Prescription Opioid Litigation*; Case No. 17-md-2804

Dear Special Master Cohen,

I write on behalf of Plaintiffs and Mallinckrodt plc. After productive discussions, the parties have reached agreement regarding the initial scope of discovery in connection with Mallinckrodt plc's motion to dismiss for lack of personal jurisdiction. Plaintiffs reserve their rights to seek additional discovery as warranted; Mallinckrodt plc reserves its right to oppose any additional discovery as warranted. The parties agree that Mallinckrodt plc will produce non-privileged documents related to the following ten categories, to the extent such documents exist:

- (1) Mallinckrodt plc corporate organizational charts;
- (2) Mallinckrodt plc tax returns including all schedules and attachments;
- (3) Mallinckrodt plc policies regarding branding, marketing, sales, promotion, distribution, regulatory affairs, pharmacovigilance to the extent they apply to opioids;
- (4) schedules for the separation agreement between Mallinckrodt plc and Covidien plc;
- (5) Mallinckrodt plc policies regarding accounting;
- (6) Mallinckrodt plc policies regarding corporate management to the extent such policies bear on opioid-related subsidiaries;
- (7) Mallinckrodt plc annual reports;

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(8) Mallinckrodt plc's general ledger and additional materials sufficient to reflect inter-company transfers to or from Mallinckrodt plc relating to Mallinckrodt LLC and SpecGx LLC and/or otherwise related to the opioids business (including the opioids-related API business);

(9) any non-privileged emails from Hugh O'Neill's custodial file responsive to Plaintiffs' requests that were not already produced by Mallinckrodt LLC related in any way to opioids; and

(10) non-privileged documents related to the 2017 settlement with DEA.

In addition, Mallinckrodt plc agrees to provide an interrogatory response summarizing travel by Mallinckrodt plc officers, directors, or employees to the state of Ohio for business purposes related to any Mallinckrodt entity. The parties will meet and confer if necessary regarding production of any documents related to such travel.

Mallinckrodt plc also agrees to confirm whether there existed any board-level task forces or working groups regarding opioids, or if the board received reports regarding the opioid business, and that the parties will meet and confer regarding production of related non-privileged documents to the extent any such task forces, working groups, or reports exist.

Please do not hesitate to let us know if you need any further information.

Sincerely,

/s/ Andrew J. O'Connor

Andrew J. O'Connor

Appearing specially for Mallinckrodt plc